

Congress of the United States
Washington, DC 20515

August 10, 2020

The Honorable Andrew R. Wheeler
Administrator
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington, DC 20460-0001

Dear Administrator Wheeler:

We are disappointed with the recent proposal from the Environmental Protection Agency (EPA) to maintain the current, inadequate National Ambient Air Quality Standards (NAAQS) for annual and 24-hour particulate matter pollution (PM_{2.5}).

Under the Clean Air Act, EPA is required to set air quality standards for category pollutants using the best available science to ensure that such standards protect the public health with an adequate margin of safety. Yet despite science repeatedly showing that the current standards of 12 micrograms per cubic meter (µg/m³) for annual PM_{2.5} and 35 µg/m³ for 24-hour PM_{2.5} are not strong enough to meet the requirement of protection with an adequate margin of safety, EPA proposed to keep the standards where they are, endangering the lives of thousands.

We urge you to recognize the science that you rushed to avoid and to instead propose strengthening the NAAQS for both annual and 24-hour particulate matter pollution. We compel you to do so due for the following reasons:

- **Particulate matter is dangerous.** Right now, children across the country are playing in their backyards and on their sidewalks, trying desperately to escape the confines of their homes for some time outside. As they run, jump, and play, millions of them are breathing in tiny microscopic particles that will slip through their lungs and could even make it into their bloodstream. They cannot choose which breaths they take and which air they breathe. The particles they breathe can trigger asthma attacks, lead to cardiovascular or other lung complications¹, and influence cognitive decline.² Before children are even born, they are at risk for developmental health complications if their mothers breathe in the same dangerous particles.³ For the sake of all Americans – particularly those most at

¹ U.S. EPA. Integrated Science Assessment for Particulate Matter, December 2019. EPA/600/R-19/188.

² Peters R, Ee N, Peters J, Booth A, Mudway I, Anstey KJ. Air Pollution and Dementia: A Systematic Review. *J Alzheimers Dis.* 2019;70(s1):S145-S163. doi: 10.3233/JAD-180631.

³ Liang Z, Yang Y, Qian Z, Ruan Z, Chang J, Vaughn MG, Zhao Q, Lin H. Ambient PM_{2.5} and birth outcomes: Estimating the association and attributable risk using a birth cohort study in nine Chinese cities. *Environment International.* Volume 126, May 2019, Pages 329-335

risk, including children, but also older adults, and people with preexisting cardiovascular or respiratory diseases – strong limits on these dangerous particles must be implemented.

- **There is strong evidence that the current standard is too weak.** By maintaining the current standards, EPA is in effect telling the public that the agency values industry and industry profits over human life. While there is no safe level of particle pollution, strengthening the standard to be more protective will save more lives that would have been at risk by leaving the standard unchanged. Even EPA’s own assessment of the health impacts calculated that strengthening the standard to 9 $\mu\text{g}/\text{m}^3$ would prevent up to 12,500 premature deaths.⁴ A stronger standard can save even more lives.
- **EPA departed from process when determining this proposal.** The Clean Air Act requires a thorough and accurate review of science as the NAAQS are reviewed and updated. Traditionally, this has been done with the inclusion of a panel of experts who possess the necessary experience and expertise to review the recent studies showing the impacts particulate matter has on health. EPA’s decision to disband the Clean Air Scientific Advisory Committee (CASAC) PM Review Panel and to truncate the Health Risk and Exposure Assessment is nothing short of a blatant disregard for the loss of life caused by pollution.⁵
- **Ignoring the need for stronger protections during a pandemic is particularly egregious.** The country continues to battle the COVID-19 pandemic – a respiratory disease – and EPA has the opportunity to set stronger standards for particle pollution, which is a known danger to respiratory health. Emerging research show a correlation between particulate matter exposure and an increased rate of death from COVID-19.⁶ The dangers of COVID-19 complications are even greater among communities of color, many of which have been systemically burdened by higher levels of air pollution. Instead of ignoring science and favoring industry, we implore you to use this opportunity to offer some good news and hope for the health of our country.
- **The burden of pollution is not equally distributed** with lower wealth communities and communities of color overrepresented in areas with the poorest air quality. For decades, environmental justice communities – low-income communities, communities of color, and Tribal and indigenous communities – have suffered disproportionately from cumulative exposure to multiple pollutants. Living on the ‘fenceline’ of polluting industries, these communities are more likely to suffer from chronic health conditions

⁴ U.S. EPA. Policy Assessment for the Review of the National Ambient Air Quality Standards for Particulate Matter, January 2020. EPA-452/R-20-002

⁵Frey H. Christopher Ph.D. The NAAQS PM Science Review Process Is Broken and Not Credible: EPA Should Start Over. Clean Air Scientific Advisory Committee; 2019.

[https://yosemite.epa.gov/sab/sabproduct.nsf/B9165A397FBF2659852584C50073D8C1/\\$File/Written Statement H Christopher Frey CASAC PM Draft PA 191203 Submitted.pdf](https://yosemite.epa.gov/sab/sabproduct.nsf/B9165A397FBF2659852584C50073D8C1/$File/Written%20Statement%20H%20Christopher%20Frey%20CASAC%20PM%20Draft%20PA%20191203%20Submitted.pdf).

⁶ Wu X, Nethery RC, Sabath MB, Braun D, Dominici F. Exposure to air pollution and COVID-19 mortality in the United States: A nationwide cross-sectional study, 2020. medRxiv 2020.04.05.20054502; doi: <https://doi.org/10.1101/2020.04.05.20054502>

triggered by particulate matter pollution. It is the EPA's responsibility to consider the racial and ethnic differences in exposure and risk, and with a stronger standard, the EPA has an opportunity to address the inequitable distribution of pollution on these overburdened communities.

As Members of Congress, we are sharing the voices of the individuals we represent and their concerns about the air they are breathing. We ask you to move forward with the best interest of our public health in mind and to set a more protective standard for both the annual and short-term particle pollution NAAQS.

Sincerely,

A. Donald McEachin
Member of Congress

Bobby L. Rush
Member of Congress

Mikie Sherrill
Member of Congress

Lisa Blunt Rochester
Member of Congress

Nanette Diaz Barragán
Member of Congress

Alma S. Adams, Ph.D.
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